# REPUBLICAN

#### Central Committee of Saint Louis County

January 31, 1995

Mr. Kenneth A. Davis, Jr. Reports Analyst Reports Analysis Division Federal Election Commission 999 E St. NW Washington, D.C. 20463

Re: Republican Central Committee of St.

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Louis County, Missouri, ID#

C00275586

Dear Mr. Davis:

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Please pardon my failure to reach you in any of my recent attempts, or to be available when you sought to reach me. Yesterday afternoon, however, I did speak with the very pleasant Ms. Amy Reynolds (I would say "amiable," but the pun might be unforgivable), who helped clarify for me what it is that you wanted me to do.

First, I've enclosed my December 31 report, which I think is timely, complete and accurate.

I had hoped to resolve this matter by now and include the other amended reports as well, but I can't do that until my last couple of questions are resolved.

You'll recall that you wrote me about three different reports, the October 31 report, the 12 Day Pre-General report and the 30-day post general report. As to each report you asked that I supply the total EVENT YEAR TO DATE AMOUNT on Schedule H4. That emendment can easily be made, and I'll gladly do that.

Secondly, as to the 30-day post-general report, you asked that I check the "type of activity" box on Schedule H2 for the phone bank. The activity was "administrative /voter drive," and my failure to check the box was an oversight. I apologize. When refiled, the amended report will include a check mark in the appropriate box.

9927 Manchester Road •

Saint Louis, Missouri 63122

(314) 963-9878

Mr. Kenneth A. Davis, Jr. January 30, 1995 Page 2

This leaves two more difficult questions, pertaining to phone banks and to our tabloid. I spoke with Ms. Reynolds, who sought to give me guidence about these matters. It's somewhat difficult on her part, however, without a fuller knowledge of what went on than I'm able to convey over the telephone.

Accordingly, I've anclosed a copy of the tabloid in question. As you can see, one-eighth of the space, one page, was devoted to our 3 congressional candidates, 1/3 to each. Moreover, approximately 1/3 of a page was devoted to Senate candidate John Ashcroft. We considered this an elaboration on the sort of general mailing that a party committee might do. If, in your judgment, it should be considered an in-kind contribution to each of the candidates affected, I would propose to charge 1/3 of 1/8 of the entire cost of the tabloid to each congressional campaign and the same amount to the senate campaign. I defer to you, however, to decide whether or not that is necessary.

The second matter at issue pertains to a phone bank. We obtained the phones and equipment without charge as a loan from the Missouri State Republican Committee. In turn, we made them available to candidates. Our only cost was installation and the charge for lines. The more burdensome difficulty is that I don't personally have the records of who used the phones when. Others, however, do, and I can obtain them -- It's just that it may take a few days.

Without a review of those records I can't even be sure whether any federal candidates used the phone bank at all. But a little checking will tell me, and, if it's necessary to correct the reports in question, we'll gladly comply.

I must tell you that it's been my intention to do all of this properly and I really regret any failure to obey even fairly technical rules. I'll make every effort to straighten this out as soon as you tell me, specifically, what you want me to do. But I thought that, rather than submit a report at this time with the amendments I know I have to make, and then amend again, later, it would be easier and better for all concerned if I only amended the reports once.

I told Amy yesterday afternoon that everyone I've dealt with at the Commission has been cooperative and helpful, as she was. I'm making every effort to do the same. Please contact me and let me know how you wish for me to proceed.

Thanks again for your assistance.

Mr. Kenneth A. Davis, Jr. January 30, 1995 Page 3

Sincerely,

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Paul E. Ground

#### REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee (Summary Page)

	( <b>8</b> L	nmary Page)							
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§ ;	]	Committe	e of St. Louis						
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, p	Г	CITY, STATE and ?	ZIP CODE				C00275		
TYPE OF PRINT	L	Manchest	er, MO 6301	1-3700			3. This committee.		Ned as a multicandidate FORM 1M)
	4. 1	PE OF REPORT	7						
		(e) April 15 Que	riedy Report			Month	nly Report Due On:		
		July 16 Que	rterly Report				March 20 🔲 Jul	na 20 y 20 gusi 20	October 20 November 20 December 20
		October 15	Quarterly Report			_	_	-	Jenuary 31
		January 31	Year End Report			Twellt	th day report preceding	<b></b>	Type of Election)
		July 31 Mid	Year Report (Non-ek	ection Year Only)	•	electio	on on		
						Thirtie	eth day report follow	ving the (	General Election on
		Termination	Report		_				
						~~-	F1 016 344	(IIII VI	·
		b) Is this Repor	d an Amendment?	☐YE8	<b>⊠</b> No				
	<b>6U</b> 6.	MARY Covering Period	11/29/94	through_	12/31/94		COLUMN A This Period		COLUMN B
	_							<b>s</b>	7,742.57
	€.	(a) Cash on H	and January 1, 19		H-1.I-1				
		(b) Cash on H	and at Beginning of F	Reporting Period	11F1-11 IF1181 III 1811 II 1181 IILISII ILI	. S	350.03		
		(c) Total Rece	lpts (from Line 19)			\$	18.89	\$	23,608.52
		(d) Subtotal (ex	dd Lines 5(b) and 6(d	c) for Column A a	ind	•	368.30	\$	31,351.09
	_	Lanes 6(8) 8	and 6(c) for Column 8	3)		4		<del> </del>	
	7.	Total Disburseme	nts (from Line 30)			. \$	56.03	S	31,038.20
	<u>e.</u>				ne 7 from Line 6(d))	. \$	312.89	\$	312.89
	₽.		ions Owed TO the Ci redule C and/or Sche			. \$	0.00		her Information contact: Bection Commission
	10.		ions Owed BY the Co		.1416	\$	0.00	999 E S	treet, NW port, DC 20483
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	59	nature of Treasurer	<del>^^ ^</del>	, g. Gioung			<u>-</u>	Dale ,	1
	_(	3-1	COH	<u> </u>				<u> </u>	31/95
	NOT	: Gubmission of tak	se, erroneous, or inc	omplete informati	on may subject the per	son alg	ning this Report to the	penalties o	of 2 U.S.C. §437g.
							· · · · · · · · · · · · · · · · · · ·		

(revised 9/93)

4-00178

#### **DETAILED SUMMARY PAGE**

OF RECEIPTS AND DISBURSEMENTS PAGE 2, FEC FORM 3X

(revised 1/1/91)

IVANE	eofcommittee Republican Central Committee of St. Louis Co	REPORT COVERING PERIOD PROM 11/29/94 TO	0: 12/31/94
	Missouri	COLUMN A Total This Period	COLUMN B Calendar Year
	L Receipts	1042 (415) 4164	CONTRACT ON
11. C	ontributions (other than loans) From:		
A.	Individual/Persons Other Than Political Committees		
	I. Itemized (use Schedule A)	0.00	400.00
	IL Unitamized		
	iř. Total(add i and ii) ➤	0.00	400.00
ь.	Political Party Committees		
C.			
đ.	,		
	ransfers From Affilialed/Other Party Conventitees		
	Loans Received		
	pan Repayments Received		
	fisets To Operating Expenditures (Refunds, Rebates, etc.)		
	efunds of Contributions Mede to Federal Candidates and Other Political Committees		
	ther Federal Receipts (Dividends, Interest, etc.)		
	ansfers from Montederal Account for Joint Activity	18 89	23,2D8 63
	ntal Preceipts	18.89	23,608.63
<b>20.</b> To	ntal Federal Receipts	<u> </u>	
	E. Distursements		
21. Óc	perating Expenditures:		
 	Shared Federal/Non-Federal Activity (Krom Schedule H4)		
•	L Federal Share	6.30	7,736.19
	i. Non-Faderei Share	18.89	23,208.51
b.		30.84	93.50
٠. د	Total Operating Expenditures	56.03	31,038.20
	ansiers to Affiliated/Other Party Committees	30.03	31,030.20
	ontributions to Federal Candidates/Committees and Other Political Committees	<u> </u>	
	dependent Expenditures (use Schedule E)	<u> </u>	
	cordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)	<del></del>	
	Isr Repayments Mede	· ·	
	ens Medie	· <del></del>	
	atunds of Contributions To:		
	Individuals/Persons Other Than Political Committees		
8. N	Political Party Committees		
b.			
c. d	Other Political Committees (such as PACs)		
-	her Disbursements		
	tal Disbursaments	56.03	31,038,20
	tal Federal Disbursements	37.14	7,829,69
, io		3/.14	7,027,03
	IR. Net Contributions/Operating Expenditures		
52. To	rial Contributions (other than Icans)(from line 11d)	<del>-</del>	_400.00
3. Tal	tal Contribution Refunds (from line 28d)		
34. Nei	t Contributions (other than loans)(subtract line 33 from 32)		
35. Tot	tal Federal Operating Expenditures	37.14	7.829.69
	sets to Operating Expenditures (from line 15)		
		37.14	
7. Ne	t Operating Expenditures	37.14	7,829. <del>6</del> 9
			4-00179

#### RECEIPT SCHEDULE H3

(effective 1/1/91)

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## TRANSFERS FROM NON-FEDERAL ACCOUNTS

PAGE OF
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4-00173

•				FOR LINE 18
NAME OF COMMITTEE				TOTAL AMOUNT
Republican Central Committee of S	t. Louis Cou	nty, Misso	ouri	TRANSFERRED
NAME OF ACCOUNT		DATE	E OF RECEIPT	
Republican Central Committee Fede	ral Campaign	Acct. Dec	ember 6, 1994	\$ 18.89
	BAIEAKO	OWN OF TRANSPI		
	DRIVE AMOUNT	PIRECT FUND FRAISING AMOUN		
7 Todal Administration Ofeder Prince	13.89		CANDIDATE SUPPORT	
i) Total Administrative/Voter Drive				
ii) Direct Fundraising (List Events-Amount for Each)				
a) b}				
c)				
O)     Total Amount Transferred For Direct Fundralsing				
Exampt Activity/Direct Candidate Support				
(List Events-Amount For Each)				
e)				
c)			<u> </u>	
d)  a) Total Amount Transferred For Exempt Activity/Direct				
Candidate Support				
NAME OF ACCOUNT		DATE	OF RECEIPT	_
				<b> </b> \$
		DWN OF TRANSFE		
	ADMINIVOTER DRIVE AMOUNT	DIFFECT FUND- RAISING AMOUN	IT ACTIVITY/DIRECT	
l) Total Administrative/Voter Drive			CANDIDATE SUPPORT	
1) Local Agricultural Additional Control of the Con				
ii) Direct Fundralsing (List Events-Amount for Each) a)				
b)				
d)				
-1 Total America Transplanta Configura Constitution				
III) Exempt Activity/Direct Candidate Support				
(List Events-Amount For Each)				
a)b)				
c)				
d) e) Total Amount Transferred For Exempt Activity/Direct				
Candidate Support				
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Į	ADMIN/YOTER DRIVE AMOUNT	DIRECT FUND- RAISING AMOUNT	EXEMPT T ACTIVITY/DCS	
SUBTOTAL THIS PAGE	18.89			18.89
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TOTAL THIS PERIOD	18.89		_ [	18.89

### DISBURSEMENT SCHEDULE H4 (effective 1/191)

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## JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

FOR LINE 21a NAME OF COMMITTEE Republican Central Committee of St. Louis County, Missouri TOTAL AMOUNT PURPOSE/EVENT FEDERAL SHARE NON-FEDERAL A. FULL NAME, MALING ADDRESS & ZIP CODE SHARE Long Dis-A.T. & T. tance Tele-P.O. Box 27-866 6.30 18.89phone Serv. Dec. 6. '94 25.19 Kansas City, MO 64184-0866 X ADMINISTRATIVE/VOTER DRIVE ☐ FUNDRAISING CATEGORY: LI EXEMPT EVENT YEAR TO DATE: 6 30,919.51 I DERECT CANDIDATE SUPPORT. TOTAL AMOUNT FEDERAL SHARE NON-FEDERAL B. FULL NAME, MAILING ADDRESS & ZIP CODE PUPPOSE/EVENT DATE **SHARE** □ EXEMPT · ADMINISTRATIVE/VOTER DRIVE TJ FUNDRAISING CATEGORY: ■ DIFFECT CANDIDATE SUPPORT EVENT YEAR-TO-DATE: \$ TOTAL AMOUNT NON-FEDERAL C. FULL NAME, MAILING ADDRESS & ZIP CODE PURPOSE/EVENT DATE PEDERAL SHARE SHARE CATEGORY: □ ADMINISTRATIVE/VOTER DRIVE ☐ FUNDRAISING. I EXEMPT DIFFECT CANDIDATE SUPPORT EVENT YEAR-TO-DATE: FEDERAL SHARE NON-FEDERAL D. FULL NAME, MAILING ADDRESS & ZIP CODE **PURPOSE/EVENT** DATE TOTAL AMOUNT SHARE LI PUNDRASING I ! EXEMPT CATEGORY: □ ADMINISTRATIVE/VOTER DRIVE DIPECT CANDIDATE SUPPORT EVENT YEAR-TO-DATE: TOTAL AMOUNT FEDERAL SHARE NON-FEDERAL E. FULL NAME, MAILING ADDRESS & ZIP CODE PURPOSE/EYENT DATE SHARE : EXEMPT I FUNDRAISING CATEGORY: □ ADMINISTRATIVE/YOTER DRIVE I DIRECT CANDIDATE SUPPORT EVENT YEAR-TO-DATE: FEDERAL SHARE NON-FEDERAL F. FLUL, NAME, MAILING ADDRESS & ZIP CODE PURPOSE/EVENT DATE TOTAL AMOUNT SHAPE CATEGORY: ☐ ADMINISTRATIVE/VOTER DRIVE **FUNDRAISING** EXEMPT DIRECT CANDIDATE SUPPORT EVENT YEAR-TO-DATE: 25.196.30 18.89 SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE. 25.19 6.30 TOTAL THIS PERIOD (test page for each line only) (Fed. share to 21 a li and non-Fed. share to 21 a ii) .... 18.89 TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page) ......

#### SCHEDULE B

#### ITEMIZED DISBURSEMENTS

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216 Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (in Full) Republican Central Committee of St. Louis County, Missouri A. Full Name, Mailing Address and ZIP Code Boatmen's Bank of St. Louis Purpose of Disburgement Date (month, Amount of Each day, year) Disburgament This Period 7800 Forsyth Boulevard Bank Service Charges Clayton, MO 63105-3311 Disbursament for: Primary X General 11/30/94 16.78 Other (specify) B. Full Harms, Mailing Address and ZIP Code Boatman's Bank of St. Louis Purpose of Diaburgement Date Imonth. Amount of Each day, year) District This Period 7800 Forsyth Boulevard 12/31/94 14.06 Bank Service Charges Clayton, MO 63105-3311 Disburgement for: Primary 🗸 General Other (specify) C. Pull Name, Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each day, year) Disburgement This Period Distaursement for: Primery General :0 Other (specify) D. Full Name, Mailing Address and ZIP Code Purpose of Disbursament Date (month, Amount of Each day, year) Disbursement This Period Diabureament for: Primary General Other (specify) மு E. Full Name. Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amoum of Each day, year) Disburgament This Period W Primery Disbursement for: General Other (apacity) F. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each day, year) Diabureement This Periodi Disbursement for: Primary General Other (specify) G. Full Name, Mailing Address and ZIP Code Purpose of Diaburgament Darte (manth. Amount of Each ON. (Rey, year) Disbursement This Period Distructions for: Primary : Other (specify) H. Full Name, Mailing Address and ZIP Code Purpose of Desburgement Date (more), Amount of Each day, year) Claburgement This Period Premary Disbursement for: Other (specify) L Full Name, Melling Address and ZIP Code Purpose of Claburgement Date (month, Amount of Each otay, yeer) Disbursament This Period

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# Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

Hand Delivered	DATE OF RECEIPT
First Class Mail	POSTMARKED
Registered/Certified Mail	POSTMARKED
No Postmark	1-31-95
Postmark Illegible	
Received from the House Office of Records and Registration	DATE OF RECEIPT
Received from the Senate Office of Public Records	DATE OF RECEIPT
Other (Specify):	POSTMARKED
	and/or DATE OF RECEIPT
PARER	2 - 7 - 9 5 DATE PREPARED